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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

**ST. MATTHEW'S UNIVERSITY  
(CAYMAN) LTD., a Cayman Islands  
company,**

Plaintiff,

vs.

**SABA UNIVERSITY SCHOOL OF  
MEDICINE FOUNDATION, a Netherland-  
Antilles company, et al,**

Defendants.

Case No. CV-S-05-0848-BES

**DECLARATION OF RONALD D.  
GREEN, JR. IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR ENTRY  
OF DEFAULT AS TO DEFENDANTS  
SARAH WEINSTEIN, RACHAEL  
SILVER, DIEDRE MOORE, AND  
THOMAS MOORE, M.D.**

I, Ronald D. Green, Jr., declare under penalty of perjury under the laws of the United States as follows:

1. I am an associate with the law firm of Greenberg Traurig, LLP, Plaintiff's counsel in this case, and I have personal knowledge of the facts set forth in this declaration.

2. This declaration is made pursuant to Fed. R. Civ. P. 55(a) for the purpose of enabling Plaintiff to obtain an entry of default against Defendants Sarah Weinstein, Rachael Silver, Diedre Moore, and Thomas Moore, M.D., for their failure

1 to answer or otherwise defend Plaintiff's Complaint.

2 3. Plaintiff filed their Complaint in this matter on July 12, 2005.

3 4. On March 16, 2006, Plaintiff's counsel caused Defendants Sarah  
4 Weinstein, Rachael Silver, Diedre Moore, and Thomas Moore, M.D., to be  
5 personally served with the Complaint and Summons in accordance with Fed. R. Civ.  
6 P. 4.

7 5. Defendant's have failed to serve an answer or other responsive  
8 pleading as required by Fed. R. Civ. P. 12.

9  
10 DATED: July 13, 2006.

GREENBERG TRAURIG, LLP

11  
12 Ronald D. Green Jr. (Bar No. 7360)

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2006, I served the foregoing Declaration of Ronald D. Green, Jr., in support of Request for Entry of Default on:

Thomas Moore, M.D.  
c/o Nathan R. Reinmiller  
ALVERSON, TAYLOR, MORTENSEN & SANDERS  
7401 West Charleston Boulevard  
Las Vegas, Nevada 89117-1401  
Counsel for: Defendants  
SABA UNIVERSITY SCHOOL OF MEDICINE FOUNDATION, a Netherland-  
Antilles company, et al

by causing a full, true, and correct copy thereof to be sent by the following indicated method or methods, on the date set forth below:

- ☒ by mailing in a sealed, first-class postage-prepaid envelope, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service at Las Vegas, Nevada.
- ☐ by hand delivery.
- ☐ by sending via overnight courier in a sealed envelope.
- ☐ by faxing to the attorney at the fax number that is the last-known fax number.
- ☐ by electronic mail to the last known e-mail address



An employee of Greenberg Traurig, LLP